

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

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WESTERN DISTRICT OF TEXAS
U.S. CLERK'S OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

VS.

GABRIEL ROBERT CAGGIANO,

Defendant.

) CRIMINAL NO. _____

) INDICTMENT

) Counts 1-4: 18 U.S.C. §2261A

) Stalking

SA-15-CR-670 (01)

BY:  DEPUTY

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §2261A(2)(A)]

On or about March 15, 2015 and continuing through August 26, 2015, in the Western District of Texas and elsewhere, Defendant,

GABRIEL ROBERT CAGGIANO,

with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to wit: H.G., used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that placed that person in reasonable fear of the death of or serious bodily injury to that person, an immediate family member of that person, or the spouse or intimate partner of that person, in violation of Title 18, United States Code, Section 2261A(2)(A).

COUNT TWO

[18 U.S.C. §2261A(2)(B)]

On or about March 15, 2015 and continuing through August 26, 2015, in the Western District of Texas and elsewhere, Defendant,

GABRIEL ROBERT CAGGIANO,

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with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to wit: H.G., used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to that person, an immediate family member of that person, or the spouse or intimate partner of that person, in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT THREE
[18 U.S.C. §2261A(2)(A)]

On or about March 15, 2015 and continuing through August 26, 2015, in the Western District of Texas and elsewhere, Defendant,

GABRIEL ROBERT CAGGIANO,

with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to wit: M.M., used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that placed that person in reasonable fear of the death of or serious bodily injury to that person, an immediate family member of that person, or the spouse or intimate partner of that person, in violation of Title 18, United States Code, Section 2261A(2)(A).

COUNT FOUR
[18 U.S.C. §2261A(2)(B)]

On or about March 15, 2015 and continuing through August 26, 2015, in the Western District of Texas and elsewhere, Defendant,

GABRIEL ROBERT CAGGIANO,

with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to wit: M.M., used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to that person, an immediate family member of that person, or the spouse or intimate partner of that person, in violation of Title 18, United States Code, Section 2261A(2)(B).

A TRUE BILL



FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

BY: 

SARAH WANNARKA
Assistant United States Attorney